

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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ELIZABETH MANON,

Plaintiff,

13 CV 3476 (RJS)

-against-

878 EDUCATION, LLC, ALFONSO GARCIA,
Individually, and ALEX OLINER, *Individually*,

PLAINTIFF'S 26(a)
DISCLOSURES

Defendants.
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Plaintiff, by her attorneys, Phillips & Associates, PLLC, respectfully submits, pursuant to rule 26(a) et. Seq. of the Federal Rules of Civil Procedure, the initial discovery disclosures as follows:

(A) the name and, if known, the address and telephone number of each individual likely to have discoverable information that the disclosing party may use to support its claims or defenses, unless solely for impeachment, identifying the subjects of the information

Where the address is not listed, Plaintiff does not know the address of the individual, but this information should be in the possession of the Defendants.

- Plaintiff (c/o Phillips and Associates, PLLC 45 Broadway, Suite 620, New York, NY 10006, 212-248-7431). Plaintiff has knowledge of all allegations in the complaint.
- Plaintiff's family. Plaintiff's family has knowledge of her emotional distress.
- Defendants. Defendants have knowledge of all the allegations in the complaint.
- Martin Oliner (Defendants' President). Mr. Oliner has knowledge of some or all of the allegations in the complaint.

(B) a copy of, or a description by category and location of, all documents, electronically stored information, and tangible things that are in the possession, custody, or control of the party and that the disclosing party may use to support its claims or defenses, unless solely for impeachment;

- N/A

(C) a computation of any category of damages claimed by the disclosing party, making available for inspection and copying as under Rule 34 the documents or other evidentiary material, not privileged or protected from disclosure, on which such computation is based, including materials bearing on the nature and extent of injuries suffered; and

At this early juncture, Plaintiff is claiming the following damages, which damages are ongoing:

**DAMAGES FROM THE GENDER DISCRIMINATION, DISABILITY ASSOCIATION
DISCRIMINATION AND RETALIATION**

| | |
|--|---|
| Lost Earnings (Back pay as of November 16, 2012 at \$22,880/year) | \$22,000.00 |
| Emotional Distress | \$100,000.00 |
| Attorney's Fees | Unknown |
| Punitive Damages: | \$1,000,000.00 plus interest and costs |

Plaintiff reserves the right to supplement/amend this response as more information becomes available.

(D) for inspection and copying as under Rule 34 any insurance agreement under which any person carrying on an insurance business may be liable to satisfy part or all of a judgment which may be entered in the action or to indemnify or reimburse for payments made to satisfy the judgment.

N/A

Dated: New York, New York
November 5, 2013

Sincerely,

/s/
Alex Umansky (AU7961)
Phillips & Associates, PLLC
Attorneys for Plaintiff
45 Broadway, Suite 620
New York, NY 10006
aumansky@tpglaws.com
(212) 248-7431